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October 27, 2015  
VIA ECF

Hon. Michael A. Hammer  
United States Magistrate Judge  
United States District Court  
for the District of New Jersey  
Martin Luther King Building  
& U.S. Courthouse  
50 Walnut Street  
Newark, New Jersey 07101

Re: **Accurate Abstracts, LLC v. Havas Edge, LLC**  
**Civil Action No. 2:14-cv-01994 (KM)(MAH)**

Dear Magistrate Judge Hammer:

We represent defendant Havas Edge, LLC ("Defendant") in the above-referenced matter. We submit this letter application to request a fourteen (14) day extension of time, through and including November 11, 2015, for Defendant to respond to the Amended Complaint of plaintiff Accurate Abstracts, LLC ("Plaintiff"). One prior request for an extension, via an application for a Clerk's Order pursuant to Local Civil Rule 6.1(b), was made on July 22, 2014. The extension is necessary to provide us with additional time to evaluate the allegations of the Amended Complaint, confer with our client regarding the response to the Amended Complaint and finalize Defendant's anticipated counterclaim against Plaintiff for breach of contract. Plaintiff's counsel has consented to our request.

Accordingly, we respectfully request that Your Honor sign the proposed order submitted herewith granting Defendant's application for additional time to respond to the Amended Complaint, through and including November 11, 2015.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

DLA Piper LLP (US)

A handwritten signature in black ink, appearing to read 'Dan Turinsky'.

Daniel Turinsky  
Partner

cc: Anthony Ambrosio, Esq. (via e-mail and ECF)

*Defendants' answer filed  
on November 5, 2015 (D.E. 30)  
is Accepted As Having Been  
TIMELY FILED FOR THE REASONS SET FORTH  
ABOVE AND FOR GOOD CAUSE SHOWN. SO ORDERED.  
Michael A. Hammer, WMT 11/7/2015*